



California Republican Party County Treasurers Association

September 10, 2007

BY FACSIMILE -916-322-2026
Honorable Ross Johnson, Chairman
Fair Political Practices Commission
428 J Street, Suite 620
Sacramento, CA 95814

Re: Pre-Noticed Regulation 18530.31 – Agenda Item 10

Dear Chairman Johnson and Commissioners

I am the Treasurer of the Yolo County Republican Party and also the Chairman of the California Republican Party - County Treasurers' Association. In these capacities, I prepare and sign campaign reports for my county Party committee and also represent the interests of nearly 58 county central committees which have filing responsibilities under state law, and many of which also have such responsibilities under federal law.

I write to oppose the staff draft of Regulation 18530.31 which is being pre-noticed and will be discussed at your September 12, 2007 Commission meeting. I join in the comments of CRP's counsel, Charles H. Bell, Jr., and CRP's Treasurer, Keith Carlson, Esq., in opposition to the proposed regulation as drafted.

1. There appear to be substantial problems of legal authority and drafting.
2. The proposed regulation appears to conflict with the Regulation 18534 which the Commission adopted in December 2006.
3. There is no question this regulation if adopted would greatly complicate the ability of the volunteer county central committee treasurers I represent (and am one of!!) in complying with the state campaign finance laws, particularly where we raise money for a variety of state and local purposes.

Very truly yours,

Chairman, CRP County Treasurer's Association